

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

Maryam Butler  
- Plaintiff

FILED  
HARRISBURG, PA

JUL 03 2025

V.

PER

DEPUTY CLERK

NEW AMERICAN Funding - BROKER Solutions, INC  
- Defendant

- Case No. 1:25-CV-00690

Plaintiff's Motion For Default Judgement  
UNDER Rule 55(b) (2)

July 03, 2025 Plaintiff respectfully moves this Honorable Court to enter default judgement Against Defendant NEW AMERICAN Funding, Pursuant to Federal Rule of Civil Procedure 55(b) (2), and IN Support thereof states the following:

1. ON June 27, 2025, Defendant failed to File An answer or Response pleading within the time Allowed by the Federal Rules of Civil Procedure And this Courts Prior orders.
2. While Defendants Motion For extension (Docket #24) was filed Prior to the June 27, 2025 deadline, NO answer or other responsive Pleading was Filed by that date, AND the Court subsequently issued an order (Docket #30) directing that all filings be held in Abeyance without PRIOR leave.



3. Plaintiff Motion For entry of Default Docket #28 remains unopposed and Established that Defendant is in Procedural Default.

4. Plaintiff has filed A detailed declaration of Damages (Docket # 33) supported by exhibits documenting both economic losses and non economic harm resulting from the Defendants conduct, including Regulatory misrepresentations, Blocked Communications (Exhibits D-D2) off Portal documents and Misstatements to the CFPB (Exhibit 6).

5. Plaintiff respectfully submits that, in the interest of Judicial efficiency and Fairness, and Given the Lack of Any timely Response From Defendant Entry of default Judgement in THE AMOUNT OF \$ 6,000,000 is Appropriate AT THIS TIME. THIS Figure is Detailed in Plaintiff's Declaration filed as Docket # 33

6. REQUEST FOR EMERGENCY RULING  
IN Light of the Procedural default, the Seriousness of the Allegations, and the upcoming Federal Holiday, Plaintiff respectfully Requests THAT THIS HONORABLE Court consider this motion on an emergency basis and, if appropriate, enter Judgement without delay to prevent further HARM AND UNCERTAINTY. Plaintiff stands Ready to comply with any additional instructions the Court issues.

PRAYER FOR Relief

WHEREFORE, Plaintiff respectfully PRAYS THAT



THIS COURT - ENTER Default Judgement Against  
NEW AMERICAN FUNDING UNDER RULE 55(b)

AWARD DAMAGES IN THE AMOUNT OF \$6,000,000  
AS SET FORTH IN DOCKET # 33

STRIKE DOCKET # 31 as improperly filed in  
violation of DOCKET # 30

Consider this motion on an EMERGENCY basis AND  
enter Prompt Judgement to Preserve the  
integrity of the Proceedings.

Respectfully Submitted  
this 3RD day of July, 2025

Audrey Pete Davis  
Authorized Representative for Plaintiff  
2041 GREENWOOD ST  
HBG PA 17104

### CERTIFICATE OF SERVICE

I hereby certify that a true AND correct copy of  
the following motion for Default Judgement was  
served via email to jmcally@cohenseglins.com

Date July 03, 2025

A. 